

Judge Sherwood
United States Bankruptcy Court
April 9, 2022
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At the hearing held on March 29, 2022 (the “Disclosure Statement Hearing”), the Court conditionally approved the Disclosure Statement, subject to the submission of a revised Disclosure Statement that addressed various parties’ disclosure objections.

The First Amended Disclosure Statement does not address the issues raised in the MSC Objection. Exhibit “A” hereto is a redline showing the language that MSC proposed to the Debtors for inclusion in the Disclosure Statement marked against the First Amended Disclosure Statement. The language requested by MSC is purely factual. It accurately discloses MSC’s interests and its bona fide rights. Notwithstanding the Court’s clear direction at the Disclosure Statement Hearing, the Debtors flatly dismissed MSC’s revisions without any meaningful explanation as to why MSC’s language was unacceptable.

Accordingly, MSC respectfully requests that the Court direct that the Joint Debtors’ First Amended Disclosure Statement be revised to include the language requested by MSC as shown on the enclosed redline before issuing any order approving same.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Allison J. Arotsky

Allison J. Arotsky

Encl.

cc: Sari B. Placona (via email)
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